

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**THE DRA PARTIES' MOTION
SUBMITTING AMENDED WITNESS DECLARATIONS**

To the Honorable United States District Court Judge Laura Taylor Swain:

AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor” and, together with the Servicer, collectively, the “DRA Parties”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with bonds the DRA issued, and respectfully submit their amended witness declarations for the Confirmation Hearing in accordance with the *Order Memorializing Certain Rulings Made at the November 1, 2021, Pretrial Conference*, Dkt. No. 19009 (the “Order”).

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

1. The Order instructs all pertinent parties to file “amended witness declarations reflecting accurate references to the filed exhibits” by November 3, 2021 at 11:59 P.M. (Atlantic Standard Time). *See* Order at p. 2.

2. Subject to the reservations and the caveats made by the DRA Parties at Dkt. No. 18723, the DRA Parties respectfully submit the following amended witness declarations pursuant to the Order: (i) *Declaration of Lizette Martinez under Penalty of Perjury Pursuant to 28 U.S.C. § 1746* dated November 3, 2021 attached hereto as **Exhibit A**; (iii) *Amended Unsworn Declaration of Douglas J. Brickley under Penalty of Perjury Pursuant to 28 U.S.C. § 1746* dated November 3, 2021 attached hereto as **Exhibit B**; and (iv) *Declaration of David Prager under Penalty of Perjury Pursuant to 28 U.S.C. § 1746* dated November 3, 2021 attached hereto as **Exhibit C**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of November, 2021.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s *Fifteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 17127-1) (the “**CMP Order**”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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